



IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:23-MJ- 302

KALEB LAYNE NIX (01)

CRIMINAL COMPLAINT

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about June 2, 2021, in the Northern District of Texas, the defendant, **KALEB LAYNE NIX**, employed, used, persuaded, induced, enticed, or coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and such visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means. Specifically, **NIX** used a Samsung cellular telephone, minor victim 1, and minor victim 2 to create the following visual depiction of the minor engaged in sexually explicit conduct:

File Name	Description
20210602_211105.mp4	This 4-minute video depicts NIX exposing his genitals to MV1 and MV2, MV1 touching Nix's genitals, Nix masturbating his penis, and ejaculating on MV1.

In violation of 18 U.S.C. §§ 2251(a) and (e).

INTRODUCTION

I, Nathan Bishop, being duly sworn, depose and state as follows:

1. I am a police officer with the Arlington Police Department and have been employed as an officer since 2008. I am also a task force officer with the United States Department of Homeland Security, Homeland Security Investigations (HSI).

2. As part of my official duties, I investigate criminal violations relating to the sexual exploitation of children, including the production, transportation, distribution, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252 and 2252A.

3. As part of my duties with the Arlington Police Department and as a federal Task Force Officer, I have gained experience in the conduct of criminal investigations involving child exploitation.

4. The facts in support of probable cause for this complaint are based on my investigation, information provided by other law enforcement officers, and my training and experience. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts I believe are necessary to establish probable cause to believe that a violation of sexual exploitation of children – producing child pornography, in violation of 18 U.S.C §§ 2251(a) and (e), has been committed by

KALEB LAYNE NIX.

PROBABLE CAUSE

5. On April 7, 2023, the Arlington Police Department received a Cybertipline Report from the National Center for Missing and Exploited Children (NCMEC) regarding a Google account user uploading files of child pornography. This Google account was identified as kalebnix8@gmail.com.

6. The name, date of birth, and phone number provided in the Cybertipline report matched prior Arlington Police records for **KALEB LAYNE NIX**. The Cybertipline report included photos of **NIX** and his Texas Driver's License which had also been uploaded to the Google account.

7. On April 10, 2023, the Arlington Police Department executed a search warrant at **NIX's** apartment in Arlington. A Samsung cellular telephone SM-G991U bearing serial number R5CN0C716X was seized during the search warrant in **NIX's** bedroom.

8. A forensic examination conducted on the cell phone resulted in the discovery of child pornography, including two files described below:

File Creation	File Name	Description
June 2, 2021	20210602_211105.mp4	A 4-minute video depicts NIX exposing his genitals to MV1 and MV2, MV1 touching NIX's genitals, NIX masturbating his penis, and ejaculating on MV1.

I have reviewed these files, which reflects that it was created on or about June 2, 2021, and I submit that it depicts child pornography as defined by 18 U.S.C. § 2256.

9. On April 14, 2023, I spoke with the father of two 7-year-old children (hereinafter referred to as “Minor Victim 1” / “MV1” and “Minor Victim 2” / “MV2”). He identified MV1 from the videos and identified the background as a prior residence in Fort Worth, Texas. MV1 and MV2 would have been 5 years old at the time of the video recording. He said MV1 and MV2 were staying with their mother at that time who used an online childcare service to schedule a babysitter. I was provided a screenshot of an online babysitting service with the profile name “Kaleb N.” and profile photo of **NIX** as being the babysitter from June 2021 with MV1 and MV2. Further investigation confirmed NIX as being the babysitter for these minors. I have compared the online babysitting service profile photo with his drivers license and it is the same individual.

10. The Samsung SM-G991U cellular telephone was manufactured in Vietnam; therefore, the Samsung Sm-G991U traveled in interstate and foreign commerce, and the visual depiction described in this affidavit was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce.

CONCLUSION

11. Based on the facts set forth in this affidavit, I respectfully submit that probable cause exists to believe that on or about June 2, 2021, in the Northern District of Texas, the defendant, **KALEB LAYNE NIX**, employed, used, persuaded, induced, enticed, or coerced a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, which was produced using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, that is a cellular telephone, in violation of 18 U.S.C. §§ 2251(a) and (e).



Nathan Bishop, Task Force Officer
Homeland Security Investigations

Sworn to before me and subscribed in my presence this 17th day of April 2023, at 1:37 p.m. in Fort Worth, Texas.



HAL R. RAY, JR. Jeffrey Cuceton
UNITED STATES MAGISTRATE JUDGE